

FIRST NATIONAL BANK

P. O. Box 520 ~ 206 Highway 271 N ~ Gilmer, TX 75644
Phone (903) 843-4166 ~ Fax (903) 843-4813

February 7, 2014

Monica Jackson
Office of the Executive Secretary
Bureau of Consumer Financial Protection
1700 G Street, NW
Washington, DC 20552
Docket No. CFPB-2013-0029

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Robert deV. Frierson, Secretary
Board of Governors of the Federal Reserve
System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket No. OP-1462

Legislative and Regulatory Activities
Division
Office of the Comptroller of the Currency
Mail Stop 9W-11
400 7th Street, SW
Washington, DC 20219
Docket ID OCC-2013-0014

RE: Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Banks Regulated by the Agencies

Dear Sir or Madam:

The First National Bank of Gilmer, located in Gilmer, Texas has been in existence since April 1900. We have \$320,000,000.00 in assets, 10 branches and 107 employees.

Our branches are located in 4 Texas County's and we are a rural bank with a substantial number of Hispanic customers.

For a community bank to survive, especially in these difficult times, they need to meet the credit needs of their customers. As such, having a group of employees that reflect the demographics of our community is essential to our survival.

Our compliance costs have greatly increased over the last few years, especially after the passage of the Dodd-Frank Act. We don't have the personnel, the training or the software to compile the various metrics suggested in the proposal. And, even if we did we do not believe there would be a change in our hiring or retention practices.

We don't have the ability to assess the diversity practices of our suppliers. If we were required to attempt to do so it would be just one more expensive regulatory burden that we would have to absorb.

Please withdraw this proposal and come up with a simpler, more effective and less costly way for community bank to comply with this section of the Dodd-Frank Act.

Thank you for the opportunity to share our views,

Sincerely,



Kelly D. Stretcher
President and CEO
First National Bank of Gilmer